

August 6, 2007

ENFORCEMENT PRIORITY SCREENING FACILITIES

Subtitle C

Combined Systems, Inc., Jamestown, PA. Jeanna Henry
Defense Logistics Agency- Defense Supply Ctr. Richmond, Richmond VA. Clark Conover
Virginia Panel Corporation, Waynesboro, VA. Ken Cox

Subtitle I

Budget Rent-A-Car, Washington, DC. Martin Matlin
Willow Bank Exxon, Bellefonte, PA. Martin Matlin
Fort Lesley J. McNair, Washington, DC. Melissa Toffel
PEPCO Kenilworth Fueling Station, Washington, DC. Melissa Toffel
Edgewater Stable, Washington, DC. Melissa Toffel
Watergate Chevron, Washington, DC. Melissa Toffel
Bowie's Incorporated, Washington, DC. Melissa Toffel
H3 Stable, Washington, DC. Melissa Toffel
The Specialty Hospital of Washington - Hadley, Washington, DC. Melissa Toffel
Amerada Hess - Station #51502, Washington, DC. Gary Morton
Amerada Hess - Station #51501, Washington, DC. Gary Morton
U.S. Postal Service Delivery Annex, Silver Spring, MD. Marie Owens

ENFORCEMENT PRIORITY SCREENING CHECKLIST
ENFORCEMENT SENSITIVE - DO NOT RELEASE

Name and Location of Violator: <u>Combined Systems, Inc.</u> <u>388 Kinsman Road</u> <u>Jamestown, PA 16134</u>	Program Contact: <u>Jeanna Henry</u> ORC Contact: _____ EPA ID #: <u>PAR000039875</u>
Industry SIC Code: <u>3483</u> Date of Inspections: <u>June 26, 2007</u>	# of Employees: _____ Annual Income: _____
Recommended Action: <u>APO</u>	EJ Area: _____
Projected Quarter: _____	Children's Health Issue: _____
SCREENING QUESTIONS	
<p>1. What is the violation(s)? Were there violations of reporting requirements such as manifest, DMRs, lab reports or training? Did the violation(s) deprive EPA or any state or local environmental agency of information critical to its program operation or otherwise undermine the regulatory scheme? Please Describe:</p> <p>1A. 40 C.F.R. § 262.34(a)(2) - Facility failed to mark at least five (5) containers of hazardous waste without an accumulation start date. The Facility's practice is date containers of hazardous waste on the date such containers become full.</p> <p>1B. 40 C.F.R. §262.34(c)(1)(ii) - Facility failed to properly label a number of satellite accumulation containers.</p> <p>1C. 40 C.F.R. §262.11 - Facility failed to make a waste determination for its used aerosol can and used lamp waste streams.</p> <p>1D. 40 C.F.R. §264.175 - Facility did not provide secondary containment for one of its hazardous waste accumulation areas. (State requirement Pa Code 25 § 265a.179)</p> <p>1E. 40 C.F.R. §265.173(a) - Facility failed to keep at least two containers of hazardous waste closed when waste was not being added or removed.</p> <p>1F. 40 C.F.R. §265.174 - Facility failed to formerly inspect hazardous waste accumulation areas on a weekly basis.</p> <p>1G. 40 C.F.R. §265.16 - Facility failed to provide initial and annual hazardous waste training in 2002, 2003 and 2004.</p> <p>1H. 40 C.F.R. §265.51(a) - Facility's contingency plan did not include information on hazardous waste accumulation areas.</p> <p>1I. 40 C.F.R. §262.41(a) - Facility submitted 2005 Biennial Report to State 3 months late.</p>	

<p>2. Could or did the violation cause or contribute to actual harm to public health or the environment? Is the violation continuing? Yes, these types of violations could result in harm to public health or the environment. No, the violations are not continuing.</p>
<p>3. Is this a repeat or recurring violation or violator? Is there a history of non-compliance? Please Describe: Yes. The state has cited similar violations in past penalty enforcement actions.</p>
<p>4. Is this a significant/high priority violation according to the program's guidance? Yes</p>
<p>5. Are there known or suspected violations of other regulatory requirements? Does this case have multi-media potential? No</p>
<p>6. Have there been any State enforcement actions taken for the violation(s)? No, EPA is lead Agency for these violations.</p>
<p>7. Has the company or any individuals employed by the company submitted false or misleading information or documents? Has there been any tampering with monitoring equipment? No</p>
<p>8. Does the violation involve knowing, willful or negligent conduct by the company or any individual employed by the company? Is there evidence that the violator was, or should have been, aware of the requirement(s) which were violated? Please describe: Yes - Facility has been fined by State for same violations discovered during EPA's June 2007 CEI.</p>
<p>9. Is it known whether the violator has received compliance assistance and has failed to correct the violation in a timely manner? Please describe: No</p>
<p>10. Is it suspected that the violator may have obtained an economic benefit or an unfair competitive advantage in its industry from its noncompliance? No</p>
<p>11. Should an enforcement action proceed to the penalty stage, are there any known SEP proposals that might be brought to the violator's attention? No</p>
<p>12. Did the violation occur in a Community Based, Sector Based or Regional Strategic Planning Priority Area as reflected in the current Enforcement MOA or elsewhere? No</p>

Enforcement Options: APO

No Action
Warning Letter

AO
APO

NOV/NON
State Lead
NOD

Judicial Referral
Criminal Referral